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14 HITACHI ELECTRONIC DEVICES (USA), INC.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

DELL INC. and DELL PRODUCTS L.P.,

Case No. 3:10-CV-01064 SI
MDL No. 1827

Plaintiffs,

v.

SHARP CORPORATION; SHARP
ELECTRONICS CORPORATION;
HITACHI DISPLAYS, LTD.; HITACHI
ELECTRONIC DEVICES (USA), INC.;
HITACHI, LTD.; EPSON IMAGING
DEVICES CORPORATION; EPSON
ELECTRONICS AMERICA, INC.;
HANNSTAR DISPLAY
CORPORATION; TOSHIBA AMERICA
ELECTRONIC COMPONENTS, INC.;
TOSHIBA AMERICA INFORMATION
SYSTEMS, INC.; TOSHIBA
CORPORATION; and TOSHIBA
MOBILE DISPLAY CO., LTD.,

**STIPULATION AND [PROPOSED] ORDER
REGARDING TIME TO RESPOND TO
AMENDED COMPLAINT**

Defendants.

WHEREAS plaintiffs Dell Inc. and Dell Products L.P. (collectively, "Dell") filed the above captioned lawsuit on March 12, 2010;

WHEREAS Dell filed a first amended complaint on April 8, 2011 (“Amended Complaint”);

WHEREAS Defendants Hitachi Displays, Ltd., Hitachi Electronic Devices (USA), Inc. and Hitachi, Ltd. (collectively, the “Hitachi Defendants”) and Defendants Sharp Corporation and Sharp Electronics Corporation, filed a motion to dismiss Count Six of the Amended Complaint alleging violations of New York’s Donnelly Act claims on April 22, 2011;

WHEREAS the Court granted Defendants' motion to dismiss Count Six of the Amended Complaint on May 17, 2011;

WHEREAS the Hitachi Defendants' deadline to respond to Dell's Amended Complaint currently is June 10, 2011;

WHEREAS extending the Hitachi Defendants' time to respond to the Amended Complaint will not alter the date of any other event or deadline already fixed by the Court;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the undersigned counsel, on behalf of their respective clients, Dell, on the one hand, and the Hitachi Defendants on the other hand, as follows:

1. Hitachi Defendants will have until July 11, 2011 to answer Dell's Amended Complaint.

1 Dated: June 9, 2011

2 /s/ Kent M. Roger

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11 *Ltd., and Hitachi Electronic Devices (USA), Inc.*

12 /s/ Debra D. Bernstein

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28 *Products L.P.*

FILER'S ATTESTATION

I, Kent M. Roger, am the ECF user whose identification and password are being used to file this Stipulation and [Proposed] Order. In compliance with General Order 45.X.B, I hereby attest that Debra Bernstein concurs in this filing.

/s/ Kent M. Roger

Kent M. Roger

Attorneys for Defendants Hitachi, Ltd., Hitachi Displays, Ltd., and Hitachi Electronic Devices (USA), Inc.

[PROPOSED] ORDER

Pursuant to the parties' stipulation set forth above and pursuant to Rule 6-1(a) of the Civil Local Rules, IT IS SO ORDERED.

Dated: June 20, 2011

By Susan Illston
HON. SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE

MORGAN, LEWIS &
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ATTORNEYS AT LAW
SAN FRANCISCO